

Nancy

US EPA RECORDS CENTER REGION 5



466141

APR 10 1984

Ms. Laurie Potter
Irathane Systems, Incorporated
2516 East 13th Avenue
Hibbing, Minnesota 55746

File	_____
Page #	_____
Reviewer	_____

Dear Ms. Potter:

Re: Hazardous Waste Disclosure

Thank you for your response to questions concerning the hazardous waste disclosure for Irathane Systems, Incorporated. Management practices for the majority of waste streams listed in the waste inventory appear to be acceptable based on current Minnesota State rules. The following points address a few issues that require further clarification.

1. As I mentioned during our telephone conversation of March 12, 1984, the Minnesota Pollution Control Agency (MPCA) does not recommend the use of crankcase oils for dust control, although there is not presently a State rule prohibiting this practice. Crankcase oil is defined by the State as a hazardous material. As such, the use of this oil for surface application is discouraged.
2. The MPCA is in the process of developing our own computerized hazardous waste tracking system. Hennepin County has been, and is currently running the statewide tracking system out of the Hopkins location. The MPCA is sent copies of the manifests. We are anticipating our own system coming on line sometime this summer and at this time, all manifests will be submitted directly to the MPCA.
3. The MPCA still has some concern regarding the cured urethane waste (waste #7). You have indicated that waste #8 (prepolymers) and waste #9 (solvent/alkali) are reacted to form the waste urethane. However, management plan forms indicate the percentages of components comprising wastes #8 and #9 vary quite widely.

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The MPCA recognizes that the codisposal request for cured urethane, submitted by Irathane Systems, Incorporated in May, 1983, was approved. Our present concern is not for the disposal of properly cured urethane. We are concerned, however, that the reaction between wastes #8 and #9 may not be complete. Given the hazardous nature of these wastes, it is necessary to prevent the disposal of unreacted materials in a sanitary landfill.

At this point we are requesting that you submit a flow plan indicating how the reaction occurs and how a large variation in the reactants can yield a properly cured product. We are also requesting evidence that the reactions are complete and that free reactants do not remain. Please verify these points for the reactions of waste #4 (solid resin) and waste #5 (liquid resin) with waste #8 as well.

Please contact me at 612/296-7349 regarding any questions.

Sincerely,

Original Signed By:

NNM/ 4-9-84

PK 4/9/84

Nancy N. Misra
Pollution Control Specialist
Hazardous Waste Compliance and Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

NNM/ch